

AB:ANR

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

C O M P L A I N T

- against - (18 U.S.C. §§ 1704, 1708, and 2)

ALI TUNKARA AND MOUSSA
TRAVELE
Defendants.

22-MJ-238

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EASTERN DISTRICT OF NEW YORK, SS:

LOUIS MAIOCCO, being duly sworn, deposes and states that he is an Postal Inspector with the United States Postal Inspection Service, duly appointed according to law and acting as such.

On or about and between February 19, 2022, and March 1, 2022, within the Eastern District of New York and elsewhere, the defendants ALI TUNKARA and MOUSSA TRAVELE did steal, take, and abstract any letter, postal card, package, bag, and mail, and any article and thing therein, from and out of any mail, post office, post station, letter box, mail receptacle, mail route, and other authorized depository for mail matter.

(Title 18, United States Code, Sections 1708 and 2)

On or about March 1, 2022, within the Eastern District of New York and elsewhere, the defendants ALI TUNKARA and MOUSSA TRAVELE did attempt by fraud and deception to obtain any letter, postal card, package, bag, and mail, and any article and thing therein, from and out of any mail, post office, post station, letter box, mail receptacle, mail route, and other authorized depository for mail matter.

(Title 18, United States Code, Sections 1708 and 2)

In or about and between February and March 2022, within the Eastern District of New York and elsewhere, the defendants ALI TUNKARA and MOUSSA TRAVELE did knowingly and unlawfully possess a counterfeit key to any lock box, lock drawer, and other authorized receptacle for deposit and delivery of mail matter with the intent unlawfully and improperly to use the same and cause the same to be unlawfully and improperly used.

(Title 18, United States Code, Sections 1704 and 2)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am an Postal Inspector with the United States Postal Inspection Service ("USPIS") and have been involved in the investigation of numerous cases involving mail theft and improper use of mail keys. I have been with the USPIS since February 2019. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. To help mail carriers in completing their walking routes, the United States Postal Service ("Postal Service") has placed green relay boxes at intersections throughout New York City. Before a carrier starts a route, the carrier places mail into bags sorted by location. To avoid carrying all the mail bags during a shift, the carrier has a driver transport them to relay boxes along the route.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

3. Each box will carry one or two of the bags, so that the carrier may keep the bulk of mail in the boxes as the carrier walks with a smaller delivery load. The carrier returns to the box to refresh the load until the bags are empty, and then continues to another part of the route. Each bag contains hundreds of mail items.

4. Moreover, each box has a lock that drivers and carriers may open with a Postal Service “arrow key,” each of which has its own serial number. The key is so named because it has the emblem of an arrow with the initials “U.S.P.S.” Based on my experience investigating cases and my interviews with Postal Service employees, the ordinary Postal Service practice is to keep the relay box always locked and to permit only drivers and carriers to open it.

5. On or about February 23, 2022, I received an email notification from Postal Police informing me of a relay box theft at 140 Cadman Plaza West. After receiving this email notification, I contacted an employee of 140 Cadman Plaza West and he provided me with photographs and video surveillance of the relay box theft and includes footage of the suspect’s vehicle. In my review of the video footage, a gray vehicle double parks on Middagh Street in Brooklyn, two male individuals exit the vehicle. The two individuals proceed to the relay box at 140 Cadman Plaza West and open it with a key. The two individuals remove the contents of the relay box and return to the gray vehicle.

6. Upon review of the photographs and the video surveillance, I identified both the gray vehicle and the registered owner of the gray vehicle involved in the theft. The registered owner of the vehicle is MOUSSA TRAVELE. The vehicle is a gray BMW 528 series sedan vehicle with a gas cap that is painted black (the “Vehicle”). The Vehicle bears New York license plate number KTN 2826.

7. Further investigation revealed additional relay box thefts by TUNKARA and TRAVELE. After I became aware of these relay box thefts, I conducted a video canvass in the areas surrounding the relay box locations. I retrieved video footage from a number of those locations. In the video footage I obtained surrounding these relay box thefts I can identify the same gray BMW 528 series sedan vehicle with a gas cap that is painted black used by TUNKARA and TRAVELE, that is, the Vehicle. These relay box thefts are described below:

8. On or about February 19, 2022, relay box thefts were reported at 141 Columbia Heights and 101 Clark Street in Brooklyn, New York. Video footage of the 101 Clark Street incident reveals the following: Shortly before the relay box theft, two male individuals exit the Vehicle and walk to the relay box at 101 Clark Street. One of the individuals opens the relay box with a key and empties its contents. Once the two individuals have emptied the relay box, they return to the Vehicle and depart.

9. On or about February 25, 2022, relay box thefts were reported at 143 Willow Street, 85 Livingston Street, and at the corner of State Street and Boerum Place in Brooklyn, New York. Video footage obtained from 205 State Street shows the Vehicle pull up to the corner of State Street and Boerum Place in Brooklyn, New York. A male individual exits the passenger seat of the Vehicle, proceeds to the relay box, opens it with a key and removes the contents. Once he removes the contents, he departs and reenters the Vehicle.

10. Video footage depicting the relay box theft near 85 Livingston Street shows two male individuals on foot approach the relay box. One individual opens it with a key. The two individuals empty the relay box and depart on foot. I have also reviewed additional footage of the Vehicle driving on Livingston Street after the theft.

11. On or about February 26, 2022, relay box thefts were reported at 141 Columbia Heights and 140 Cadman Plaza West in Brooklyn, New York. Video footage of this relay box theft at 140 Cadman Plaza West shows the Vehicle double parked on Middagh Street and two male individuals exit the Vehicle. The two individuals proceed to the relay box at 140 Cadman Plaza West and open it with a key. The two individuals remove the contents of the relay box, return to the Vehicle and depart.

12. On or about the morning of March 1, 2022, I surveilled the Vehicle that was present in all of the video footage but for one of the relay box thefts described above. During that surveillance, which began at TRAVELE's residence in the Bronx, the Vehicle traveled from the Bronx into Brooklyn. Once in Brooklyn, another member of the surveillance team witnessed the Vehicle and also saw two male individuals walking away from the relay box in front of 140 Cadman Plaza West. The two individuals entered the Vehicle and drove away. The surveillance team followed the vehicle to Henry Street and Orange Street in Brooklyn at which two individuals were observed exiting the Vehicle and opening the relay box on that corner with a key. The two individuals did not remove any contents from the relay box and they returned to the Vehicle. I believe that the relay boxes were empty because a postal employee had already emptied their contents.

13. The two individuals drove off and the surveillance team continued to follow them. The two individuals went to Pierrepont Street and Montague Terrace where observed exiting the Vehicle and walking towards a relay box on that corner. The two individuals, the defendants MOUSSA TRAVELLE and ALI TUNKARA were then arrested by USPIS and the New York City Police Department ("NYPD").

14. Based on my comparison of the defendants MOUSSA TRAVELE and ALI TUNKARA at their arrest, these are the two male individuals that are depicted in the video footage of the above-described relay box thefts. In addition, TUNKARA was wearing a black denim jacket with a distinct logo on the back, which was worn by one of the individuals during at least one of the relay box thefts described above.

15. In addition, during a search incident to the arrest of TRAVELE, I recovered twenty-two debt and credit cards and two New York City identification cards that belong to other individuals. I also recovered a cell phone and approximately \$4,240 in cash.

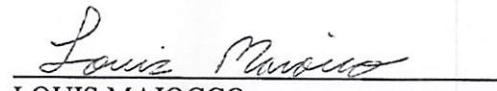
16. During a search incident to the arrest of TUNKARA, I recovered a bag which was found to contain one postal arrow key bearing identification number 198-15339 and one credit card that belonged to someone else. TUNKARA also possessed one arrow key bearing identification number 271-81426 as well as a piece of mail from the 10454 zip code which was not in his name on his person. The arrow keys recovered from TUNKARA access different area code relay boxes: the 271 arrow key opens up all relay boxes located in zip code 11201 and the 198 arrow key opens up all relay boxes located in zip code 10454.

17. During a subsequent inventory search of the Vehicle, I recovered mail from the 11201 and 10454 zip codes in names not belonging to TUNKARA or TRAVELE from the Vehicle. Additionally, I recovered receipts from various banks, including one receipt for a Chase bank for a check deposit of \$19,578.12 belonging to a resident in the 10475 zip code. I also recovered a Flushing Bank balance inquiry statement for \$18,019.36 belonging to an individual in the 11201 zip code as well as a corresponding debit card. One of the detectives involved in this investigation contacted that individual's bank and the bank provided bank video

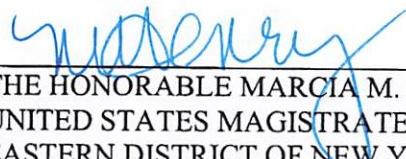
footage which shows TRAVELE and TUNKARA withdrawing money from that bank account that does not belong to either of them.

18. Based on my conversations with my counterparts who cover the Bronx, the mail recovered from TUNKARA's person and TRAVELE's vehicle coincide with addresses affected by several relay thefts that occurred on February 28, 2022, in the 10454 zip code.

WHEREFORE, your deponent respectfully requests that the defendants ALI TUNKARA and MOUSSA TRAVELE be dealt with according to law.


LOUIS MAIOCCO
Postal Inspector, United States Postal Inspection Service

Sworn to before me by telephone this
2nd day of March, 2022


THE HONORABLE MARCIA M. HENRY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK